

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

**Nicholas Zemlick,**

Plaintiff,

v.

**Sheriff Brad Burkhart, et al.,**

Defendants.

Cause No. 1:22-cv-02319-TWP-MJD

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DISPOSITIVE MOTIONS**

As permitted by Ind. T.R. 6(B)(1) and L.R. 6-1(c), because of the logistical challenges relating to the holidays and coordinating with co-counsel, Plaintiff Nicholas Zemlick respectfully requests a 21-day extension of time to respond to *Hancock County Defendants' Motion for Summary Judgment* [Dkt. 81] and *Defendants' Motion for Summary Judgment* [Dkt. 88] (collectively "MOTIONS."

1. Because the winter holidays present substantial logistical challenges to coordinating among co-counsel their responses to two separate dispositive motions, the Court should enlarge Mr. Zemlick's deadline to respond to the MOTIONS.

2. The response to the *Hancock County Defendants' Motion for Summary Judgment* [Dkt. 81] is currently December 27, 2023. This deadline has not previously been enlarged.

3. The response to *Defendants' Motion for Summary Judgment* [Dkt. 88] is currently January 5, 2023. This deadline has not previously been enlarged.

4. The requested 21-day enlarged deadlines to respond to these MOTIONS are **January 17** and **January 26, 2024**, respectively.

5. Defendants do not object to these requested extended deadlines.

WHEREFORE, Nicolas Zemlick respectfully requests the Court to extend the deadline to respond to *Hancock County Defendants' Motion for Summary Judgment* [Dkt. 81] and *Defendants' Motion for Summary Judgment* [Dkt. 88].

Respectfully submitted,

/s/ Benjamin C. Ellis

Benjamin C. Ellis

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